

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
DONTAE LAMAR WARD

Case No. 2:21-mj-30336  
Judge: Unassigned,  
Filed: 07-07-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 28, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 USC 922(g)(1), 924(a)(2)

*Offense Description*  
felon in possession of a firearm affecting interstate commerce

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: July 7, 2021

City and state: Detroit, MI



*Complainant's signature*

Edward Viverette II - Task Force Officer

*Printed name and title*



*Judge's signature*

Patricia T. Morris - U.S Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Edward Viverette II, being first duly sworn, hereby depose and state as follows:

1. I am a Police Officer with the Wayne State University Police Department, and have been so since August of 2014. I am currently a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so since February of 2020. I have graduated from the Oakland Police Academy. I have a Bachelor of Science degree in Criminal Justice from Oakland University.

2. During my time at Wayne State University Police Department, I worked uniform patrol for approximately two years enforcing traffic, local, and state laws. I also worked in the special operations division as a plain-clothes officer for approximately four years, assisting various federal, state, and local agencies. During this time, I conducted numerous investigations into state, local, and federal firearms and narcotics violations. During my assignment with the ATF, I have participated in several criminal investigations focused on crimes involving firearms and drug trafficking.

3. I have utilized a variety of investigative techniques and resources during my career, including but not limited to physical and electronic surveillance,

undercover work, informants, and cooperating sources. Through my training, experience, and conversations with other agents and law enforcement personnel, I have become familiar not only with firearms violations but with the methods people employ in drug trafficking. These methods include smuggling and safeguarding controlled substances, distributing controlled substances, and collecting, laundering, hiding, disguising, or concealing related proceeds. This information, in conjunction with my training and experience, has been useful and relevant to this investigation.

4. The statements contained in this affidavit are based, in part, on my review of written reports by Detroit Police Department (DPD) Officers Dion Corbin, Raymond Chandler, and Ian Marchand. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators and individuals with knowledge of this matter, my investigation, and the review of documents. However, this affidavit does not set forth each and every detail I know regarding this investigation.

5. I submit that the evidence described below establishes probable cause to believe that DONTAE LAMAR WARD has committed the federal crime of being a felon in possession of a firearm affecting interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

6. On Friday, May 28, 2021, at approximately 12:40 a.m., DPD officers Dion Corbin and Raymond Chandler were on patrol in a scout car on the East Side of Detroit on the lookout for a grey Pontiac Grand Prix wanted in connection with a number of local armed robberies occurring in the early morning hours. At that time, the officers observed a grey Pontiac Grand Prix on Duchess Street just south of Whittier Avenue. They saw that the Grand Prix's license plate lamp and right break light were defective.

7. Officers Corbin and Chandler initiated a traffic stop on the Grand Prix, which came to a stop on Duchess Street north of Yorkshire Road. Both officers exited their scout car and approached the Grand Prix on foot. Officer Chandler observed a single occupant in the driver's seat, who was later identified as DONTAE LAMAR WARD. As the officers attempted to speak to WARD, he drove away, fleeing the scene. Officers told dispatch about the fleeing vehicle. Moments later, another DPD scout car, occupied by Officers Ian Marchand and Steven Scott, picked up the pursuit, which quickly ended when the Grand Prix had a minor collision with another vehicle, left the road, and collided with a traffic sign on the southside of Whittier Avenue and Laing Street. When officers approached the Grand Prix, they saw WARD move from the back seat to the front driver's seat. When Officer Chandler approached the Grand Prix, he could clearly through the front windshield

that WARD was physically reaching his hands into the back seat of the car. At gunpoint, he ordered WARD to unlock the car door and place his hands on his head. At that moment the engine of the Grand Prix began to rev and the car moved forward slightly. Officer Chandler pulled WARD out of the Grand Prix. WARD was placed on the ground, and Officers Chandler and Marchand handcuffed Ward and placed him under arrest.

8. Once WARD was secured, Officer Corbin recovered a black GLOCK 23 Gen 4 .40 caliber pistol with a rubber grip from the floor of the back seat of the Grand Prix. The pistol had an extended magazine with fifteen (15) live rounds, and it contained one live chambered round.

9. Officers also seized a black ski mask that officers had seen on Ward's head.

10. On May 29, 2021, ATF Task Force Officer Angela Bunch conducted a computerized criminal history check on DONTAE WARD. The check reflected that in 2007, in Wayne County Circuit Court, WARD was convicted of and sentenced for carjacking, assault with intent to do great bodily harm less than murder, and third-degree fleeing and eluding. All three crimes are felonies.

11. On June 24, 2021, I consulted firearms interstate nexus expert ATF Special Agent Jimmie Pharr about the GLOCK pistol described above. Special

Agent Pharr advised, based upon the verbal description provided and without physically examining the pistol, that this pistol is a “firearm” within the meaning of the firearms chapter (Chapter 44) of Title 18 of the United States Code, see 18 U.S.C. § 921(a)(3); that it was manufactured outside of the State of Michigan after 1989; and that therefore it had traveled in interstate commerce.

12. Based upon the above information, I submit that there is probable cause to believe that on or about May 28, 2021, DONTAE LAMAR WARD, a convicted felon, possessed a firearm in the Eastern District of Michigan that had traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).



Edward Viverette II  
Task Force Officer  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means this July 7, 2021 of July 2021.



PATRICIA T. MORRIS  
United States Magistrate Judge